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*Suit Against State—Jurisdiction—Cross Bill.—Pt. Royal & A. R. R. Co. v. State of South Carolina*, 60 Fed. Rep. 552. A State as a sovereign authority cannot be sued without her own consent; but when a State voluntarily comes into court, her standing before the court is that of an individual and a cross bill against her will be sustained, if it contains matter relevant to the original bill.

*Telegraph Companies—Mental Suffering—Damages.—In Western Union Telegraph Co. v. Proctor*, 25 S. W. Rep. 811 (Texas), it was held, contrary to many modern decisions, that mental suffering is a proper element of damage for delay of a telegraph company in delivering a telegram. In this case a message was sent by a father to prevent the marriage of an infant daughter. The delivery of the telegram was delayed and the marriage took place. It was held that the father could recover for loss of service until the daughter had reached the age of eighteen; also for mental distress caused by the unsuitable marriage.

*U. S. Marshals—Deputies—Action for Compensation.—Powell v. United States*, 60 Fed. Rep. 687 (Ala.). In an action by a deputy marshal for compensation for services rendered, it was shown that as the marshal, alone, was the salaried officer of the government, and the deputy received pay merely through fees, there was no privity existing between the deputy marshal and the government. The conclusion was that the deputy marshal was not an officer of the United States and, not being a party to a contract, could not maintain his suit.

*Writ of Error—Final Judgment—Attachment.—Hamner v. Scott*, 60 Fed. Rep. 343. Plaintiff sued defendant on promissory notes, and sued out an attachment in court below, which attachment was quashed on motion of defendant, the principal action still pending. Held, on appeal, that a writ of error will not lie to review an order quashing an attachment, as it is not a final decision. *Standley v. Roberts*, 59 Fed. Rep. 836, distinguished as a case in which there was a final decree on all the issues, while in this case the main action is pending and undetermined in the lower court.